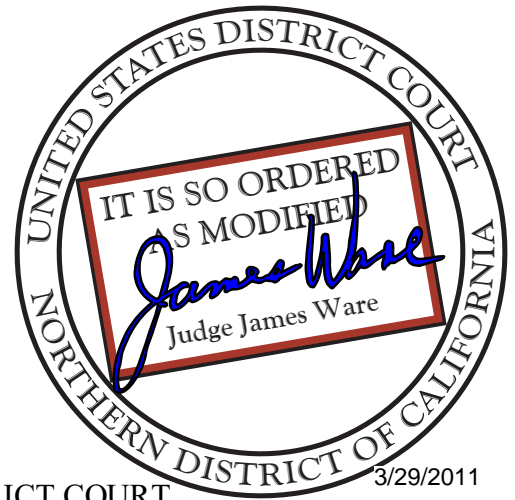


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Counsel for Defendant REYES



IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

VIRGINIA REYES,

Defendant.

No. CR-10-146 JW

**DEFENDANT'S STIPULATION AND  
PROPOSED ORDER FOR THIRTY DAY  
EXTENSION OF SELF-SURRENDER DATE**

Date: March 31, 2011

Time: 12:00 p.m.

Court: Hon. James Ware

Defendant Virginia Reyes hereby requests the Court to extend her self-surrender date to the U.S. Marshal Service or to her designated institution, FCI Dublin, by thirty days, to May 1, 2011 by 2:00 p.m. Her current surrender date is March 31, 2011. The sentence imposed by Judge Walker that she is set to serve is 24 months. The charge underlying the sentence is tax evasion.

The reason for the request is that Ms. Reyes was recently terminated from her employment. This resulted in an immediate loss of her medical insurance. Ms. Reyes has several medical issues she needs to attend to prior to her self-surrender to Dublin, as she will not have access to comparable

1 medical care while in the custody of the Bureau of Prisons. She has scheduled those appointments  
2 for the month of April, 2011.

3 Assistant United States Attorney Thomas Moore has been contacted by defense counsel, and  
4 has no objection to defendant's request for thirty additional days for self-surrender to FCI Dublin, as  
5 indicated by his electronic signature at the conclusion of this stipulation.

6 WHEREBY, Ms. Reyes prays that this Court will grant the requested relief, and will extend  
7 her self-surrender date to May 1, 2011 at 2:00 p.m.

8  
9 Dated: March 23, 2011

/s/  
\_\_\_\_\_  
ELIZABETH M. FALK  
Counsel for Maria Reyes

10  
11 Dated: March 23, 2011


/s/  
\_\_\_\_\_  
THOMAS MOORE  
Assistant United States Attorney

12  
13  
14  
15  ~~PROPOSED~~ ORDER

16 For the reasons stated in this stipulation, it is hereby ORDERED that the self-surrender date  
17 for Maria Virginia Reyes to FCI Dublin or the United States Marshal Service shall be extended by  
18 thirty days. The new surrender date shall by **May 2, 2011** at 2:00 p.m.

19  
20 IT IS SO ORDERED.

21  
22 Dated: March 29, 2011

23  
24   
\_\_\_\_\_  
THE HONORABLE JAMES WARE  
Chief Judge  
United States District Court, Northern District of  
25 California  
26